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*Attorneys for Defendant tova stabin*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**BRUCE GILLEY,**

Plaintiff,

v.

**TOVA STABIN**, Communications Manager,  
University of Oregon Division of Equity and  
Inclusion, in her official and individual  
capacities,

Defendant.

Case No. 3:22-cv-01181-HZ

**DECLARATION OF CHRIS  
WIDDOP IN SUPPORT OF  
DEFENDANT'S RULE 12(B)(1)  
MOTION TO DISMISS**

I, Chris Widdop, state as follows:

1. I am over the age of 18 years old and state that the statements set forth in this declaration are true and correct and are based upon my personal knowledge. If called as a witness, I could and would testify to the statements contained in this declaration.

2. I am a Program Associate in the University of Oregon's Public Records Office (the "Office").

1- **DECLARATION OF CHRIS WIDDOP IN SUPPORT  
OF DEFENDANT'S RULE 12(B)(1) MOTION TO  
DISMISS**

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3. On June 26, 2022, Plaintiff Bruce Gilley (“Plaintiff”) filed a public records request with the Office. He requested, among other things, “[a]ny documents, emails, or written communications during the last twelve months by the Division of Equity and Inclusion or other administrative staff pertaining to the criteria used to determine whether a user should be blocked.” A true and correct copy of that request is attached hereto as Exhibit 1.

4. On July 5, 2022, the Office responded to Plaintiff by informing him that it had no records responsive to the above-described portion of his request and stating that “[t]he staff member that administers the VPEI Twitter account and social media has the autonomy to manage the accounts and uses professional judgment when deciding to block users.” A true and correct copy of that response is attached hereto as Exhibit 2. After researching this matter more fully, I realized that statement was incorrect because the University of Oregon does have internal guidelines relating to social media use.

5. On August 26, 2022, Plaintiff’s counsel, Del Kolde, filed another public records request with the Office. This time, he requested a copy of Defendant Stabin’s out-of-office email message. A true and correct copy of that request is attached hereto as Exhibit 3.

6. On August 31, 2022, the Office responded to Plaintiff, and in that response, informed him that its July 5, 2022, response to Plaintiff’s previous public records request had been “inaccurate” in its description of “the university’s approach to monitoring its social media sites.” The Office then supplemented its July 5 response by stating that “[t]he social media guidelines published by UO’s communications unit are here: <https://communications.uoregon.edu/social-media-guidelines>.” A true and correct copy of the Office’s August 31, 2022, response is attached hereto as Exhibit 4.

*I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.*

DATED: September 7, 2022.

By: s/ Chris Widdop  
Chris Widdop

3- DECLARATION OF CHRIS WIDDOP IN SUPPORT  
OF DEFENDANT'S RULE 12(B)(1) MOTION TO  
DISMISS

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